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October 18, 2021

Honorable Alison J. Nathan  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*  
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

There is nothing surprising about the government's opposition to limited attorney-conducted voir dire and individual sequestered voir dire. (Dkt. 355.) The government's response is standard SDNY operating procedure: "*We don't do that here.*" Rarely is there an AUSA who has ever conducted voir dire, so it is easy to just say "*no.*" In this case, counsel are better positioned to address particular areas of case-related bias than is the Court, and requesting a mere minute per juror is far from onerous.

The proposed questionnaire seeks highly sensitive and personal information regarding each juror. Simply asking jurors to raise their hand in response to an invitation to speak privately on a personal topic is revealing and invasive. One would hope that the government would be sensitive to that fact and would want to ensure that a fair and impartial jury will be seated in this high-profile case. With each passing day, the amount of public exposure this case receives erodes that possibility. Below are today's Google search results:

- Ghislaine Maxwell: "about 4,740,000 (about 0.89 seconds)"
- Jeffrey Epstein: "about 26,200,000 results (0.86 seconds)"

The Court has the power and the obligation to ensure that jury selection eliminates jurors who are biased and/or motivated to serve for reasons beyond being fair and impartial.

This is an extraordinary case involving sensitive issues. We urge the Court to exercise its supervisory powers and discretion and grant the defense request for individual sequestered voir dire and very limited counsel-conducted voir dire.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: All Counsel